

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

FILED

2014 APR 15 AM 10:19

U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
DETROIT

Rand R. Heard

your name Creditors/Appellants,  
v

In re:  
CITY OF DETROIT, MICHIGAN  
AND EMERGENCY MANAGER  
KEVYN D. ORR

Chapter 9  
Case No. 13-53846  
Judge Steven W Rhodes

Debtor/Appellee

Case No. 14-cv-10434  
Hon. Bernard A. Friedman  
Magistrate Paul J. Komives

**OBJECTIONS TO CITY PLAN OF ADJUSTMENT**

I/We are residents of the City of DETROIT

and a taxpayer of the State of Michigan and a citizen of the United States.

I/We are creditor and/or creditors and the interested part and/or parties and  
object to the bankruptcy and to the City Plan of Adjustment for the  
following reasons:

1) We object to Kevyn Orr plan of adjustment because it infringes on  
and take away you're right to vote on pages 22-23 of the plan of adjustment.

2) We object to "A ten 10% reduction in monthly pension amount (b)

elimination of the deferred retirement option plan feature of Police and Fireman Retirement System (PFRS) and a **10% reduction in the monthly pension amount** provided that with respect to holders that are active employee, in the event the unfunded liabilities of the PFRS for the plan year ending June 30, 2014 is greater than the unfunded liabilities of the PFRS as of June 30, 2013, **the reduction** in the monthly pension amount shall be increased to the extent necessary to ensure that there is no change in the amount of the under funding between plan year ending 2013 and 2014.  
Section 193 page15.

3) We object to no determination on the Certificate of Participation (COP) swap claims that was a major cause of the bankruptcy in article II Classification of claims; cramdown executory contracts and unexpired lease. Article II page 23.

4) We object to the Plan of Adjustment because the City of Detroit did not negotiate in good faith prior to the filing of bankruptcy in violation of 11 USC 109 (c) In re Valley Health Sys, 383 B.R. 156, 163 (Bankr C.D. Cal 2008). In this case the city was more egregious by not negotiating at all. In re Cotton Water and Sanitation District, Douglas County, Colo., 138 B.R. 973, 979 (Bankr. D. Colo 1992) “plan referred to in 109(c)(4) is adjustment plan negotiated pre-petition in good faith.

I hereby certify that the statement made herein are true and correct under penalty of perjury and contempt of court under the laws of the United States of America

Rand R. Kemp  
Objector signature

Address 16840 STRATHMORE ST

City, State, & Zip DETROIT, MI 48235

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U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

Creditors/Appellants,

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## PROOF OF SERVICE

from the following parties

Errol Griffin  
James Patrick Casey  
Hilanius H. Phillip  
Howard Perkins  
James Lovely  
Kand R Heard  
Leslie C Little

and mailed upon the concern parties by certified mail, at the following

address:

City of Detroit  
Corporation Council  
First National Building  
600 Woodward Ave  
Detroit, Michigan 48226

Emergency Manager: Kevyn Orr  
Coleman A. Young Municipal Center  
2 Woodward 11th Floor  
Detroit, Michigan 48226

I/We hereby certify that the statements made herein are true and correct to  
the of my knowledge and belief, under penalty of perjury and contempt of  
Court under the laws of the United States of America.

Carl Williams

Objector/appellant

\_\_\_\_\_  
Objector/appellant

DATE March 31, 2014